

October 21, 2013

VIA ECFS

Marlene H. Dortch
Secretary
Office of the Secretary
Federal Communications Commission
445 12th St. SW, Room TW-A325,
Washington, DC 20554

Re.: Modernizing the E-rate Program for Schools and Libraries
WC Docket No. 13-184

Dear Ms. Dortch,

On behalf of the undersigned organizations that advocate on behalf of the Asian American, Native Hawaiian, and Pacific Islander (AANHPI) communities, we submit the following comments regarding the Federal Communications Commission's ("the Commission") proposals to modernize the E-Rate program as part of President Obama's ConnectED initiative.¹

We applaud the president's ambitious ConnectED initiative to provide 99 percent of all American students with access to next generation, high-capacity broadband services and high-speed wireless within five years. Cutting-edge technology in our country's schools that prepares students for a future in the digital age must be available to all students to avoid exacerbating existing educational disparities in underserved communities.

The aggregation of Asian American income and educational attainment perpetuates the Asian American "model minority" myth and masks the significant disparities and inequalities that exist in AANHPI communities. The E-rate program is an important resource to meet the needs of AANHPI students, especially those from low-socioeconomic backgrounds who rely on their local schools and libraries for internet access. Although disaggregated data on AANHPI home broadband adoption does not exist, research indicates the best predictors of connectivity are household income and education level. Thus, connectivity rates are likely low for low-income, immigrant and refugee communities such as Southeast Asian Americans:

- Southeast Asian Americans have lower household incomes than the national average: while 11.3% of U.S. families live below the poverty level, this is true for 18.2% of Cambodians, 12.2% of Laotians, 27.4% of Hmong, and 13.0% of Vietnamese.²
- These communities also have lower rates of attaining higher education: over 38% of Cambodian and Hmong lack a high school diploma, as do over 37% of Laotian and 30% of Vietnamese, compared to 15% of U.S. adults overall.³ Because the majority of these

¹ Modernizing the E-Rate Program for Schools and Libraries, 78 Fed. Reg. 51,598 (proposed July 23, 2013) [hereinafter "Notice"].

² U.S. Census Bureau, 2010 American Community Survey, 1-Year estimates.

³ U.S. Census Bureau, 2007-2009 American Community Survey, 3-Year estimates.

students live in poverty, they are highly concentrated in Title I schools that benefit largely from the E-rate program.

According to the Commission, only 10 percent of schools and libraries receiving E-rate support say they have the capacity needed to support high-quality digital learning.⁴ Lack of technology and services in underserved communities further increase the digital divide and reduce educational opportunities for students in these communities. For example, teachers in low income communities use technology like tablets and e-readers less than their counterparts in high income communities, making it more difficult to incorporate digital tools into their teaching.⁵

Additionally, the new shift to Common Core State standards tests will require students nationwide to take new computer adaptive tests such as those developed by Smarter Balanced Assessment System, and will require school districts to provide ample bandwidth for larger populations of students to participate in these new tests.⁶ The E-rate program will be critical in providing school districts with the resources needed to ensure that all students will be receiving the benefits of Common Core, especially those from low income backgrounds.

Although we support the Commission's efforts to maximize the cost-effectiveness and streamline the administration of the E-rate program, the reality is the demand for E-rate funding is far greater than the program's spending cap. In this funding year, schools and libraries sought \$4.9 billion in support—over twice the annual cap of \$2.25 billion.⁷ The Commission set the funding cap set in 1997 before the widespread deployment and adoption of broadband internet and requests for funding have exceeded the cap since the program's inception. We urge the FCC to increase funding to the E-rate program in order to achieve goals set forth by the ConnectED initiative.

We strongly advise the Commission to not divert funds from the Lifeline program to fund any increase to the E-rate program. Such a move would be counterproductive because education and learning take place in schools, libraries, *and* at home.⁸ The Lifeline program is a key program that is being expanded to include support for home broadband services for low income families. Students need a seamlessly connected experience as they learn via broadband enabled applications at school and complete homework assignments and projects at home that require the internet.

⁴ Notice at paras. 5-6.

⁵ Kristen Purcell *et al.*, Pew Research Ctr's Internet & American Life Project, *How Teachers are Using Tech. at Home and in Their Classrooms* 4 (2013) [hereinafter *Teachers and Tech*], http://www.pewinternet.org/~media/Files/Reports/2013/PIP_TeachersandTechnologywithmethodology_PDF.pdf.

⁶ Smarter Balanced Assessment Consortium, *The Smarter Balanced Technology Strategy Framework and System Requirements Specifications – Executive Summary* (2013), http://www.smarterbalanced.org/wordpress/wp-content/uploads/2011/12/Technology-Strategy-Framework-Executive-Summary_2-6-13.pdf.

⁷ Notice at para. 9.

⁸ The Pew Internet and American Life Project found that just 54% of teachers it surveyed said all or almost all of their students have sufficient access to digital tools *at school*, but only 18% of the same teachers said all or almost all of their students have access to the digital tools they need *at home*. *Teachers and Tech* at 3.

We look forward to working with the Commission as this critically important update of the E-Rate program proceeds. Please feel free to contact Jason T. Lagria, Asian Americans Advancing Justice | AAJC, at 202-296-2300 ext. 122 or jlagria@advancingjustice-aajc.org; or NCAPA Education Committee Co-Chairs, Quyen Dinh, SEARAC, at 202-601-2960 or quyen@searac.org and Monica Thammarath, NEA, at 202-822-7275 or mthammarath@nea.org, if you would like to discuss these issues.

Sincerely,

Asian Americans Advancing Justice | AAJC
Asian Americans Advancing Justice | Los Angeles
Asian Law Alliance
Asian Pacific American Labor Alliance, AFL-CIO
Boat People SOS - Houston
The Center for Asian Pacific American Women
Council for Native Hawaiian Advancement
Hmong American Partnership
Hmong National Development
Japanese American Citizens League
Laotian American National Alliance (LANA)
NANAY Community Economic Development Corporation
OCA – Asian Pacific American Advocates
Southeast Asian Action Resource Center (SEARAC)